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14 UNITED STATES DISTRICT COURT
15
16 CLARK COUNTY, NEVADA

17 LILIA JARRELL,
18
19 Plaintiff,
20 vs.

21 WAL-MART STORES, INC.; WALMART
22 INC. d/b/a WALMART #2593; INLAND
23 DIVERSIFIED LAS VEGAS EASTERN
24 BELTWAY, LLC; THE INLAND REAL
ESTATE GROUP, INC.; INLAND REAL
ESTATE INVESTMENT CORPORATION;
DOES 1 through 100 and ROE
25 CORPORATIONS 1 through 100, inclusive,
26 Defendant.

Case No.: 2:18-cv-01219-APG-VCF

STIPULATION
AND ORDER TO CONTINUE
MOTION IN LIMINE DEADLINE
(FIRST REQUEST)

27 Plaintiff LILIA JARRELL ("Plaintiff"), by and through her attorneys of record,
28 Dennis M. Prince and Angela M. Lee of PRINCE LAW GROUP, and Farhan R. Naqvi



1 and Paul G. Albright of the law firm NAQVI INJURY LAW, and Defendants WAL-
2 MART STORES, INC.; WALMART INC. d/b/a WALMART #2593 (hereinafter
3 collectively referred to as “Defendant Walmart”), by and through their attorneys of
4 record, Robert K. Phillips and Timothy D. Kuhls of the law firm PHILLIPS, SPALLAS
5 & ANGSTADT, LLC, submit this **STIPULATION AND ORDER TO CONTINUE**
6 **MOTION IN LIMINE DEADLINE** for the Court’s consideration.

7 In the interest of judicial economy and efficiency, the parties request a brief
8 continuance of the Motion in Limine deadline. This is the first request to extend the
9 Motion in Limine deadline, though the Motion in Limine deadline has been previously
10 altered three times. The first extension was a result of the parties’ stipulation to extend
11 discovery on October 17, 2018 (ECF 16, 17). The second extension was a result of the
12 parties’ stipulation to continue trial on October 14, 2020 (ECF 43, 44). The third
13 extension was a result of the parties’ stipulation to continue trial on February 10, 2021
14 (ECF 52, 53).

15 The parties have been diligent in this matter, but various upcoming events may
16 affect the subject Motions in Limine. On July 14, 2021, the parties met and conferred
17 regarding our respective Motions in Limine pursuant to LR 16-3(a). Although the parties
18 were able to agree on many evidentiary issues, the parties collectively have more than
19 30 Motions in Limine that they intend to file. Some of these motions, however, are
20 dependent upon the Court’s ruling regarding Plaintiff’s Emergency Motion to Substitute
21 Plaintiff’s Expert Witness Dr. Gross with Dr. Oliveri (ECF 56). The outcome of Plaintiff’s
22 Motion to Substitute may also affect the Motion in Limine due date. Moreover, there is
23 an upcoming Master Trial Calendar Scheduling Conference on August 3, 2021, which
24 may further affect the Motion in Limine due date.

25 A continuance of the Motion in Limine due date will provide additional time
26 during which the Court may render a ruling on Plaintiff’s Motion to Substitute which
27 will provide clarity on various Motions in Limine that the parties intend to file.

28



Moreover, the continuance will allow the parties to attend the Master Trial Calendar Scheduling Conference to determine when the trial will be and when the Motions in Limine will be due in accordance with the trial date. Accordingly, the parties are requesting a brief two-week extension to file our Motions in Limine from July 23, 2021, to Monday, August 9, 2021.

DATED this 15th day of July, 2021

PRINCE LAW GROUP

/s/ Dennis M. Prince

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DATED this 15th day of July, 2021

PHILLIPS, SPALLAS & ANGSTADT

/s/ Timothy Kuhls

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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: July 16, 2021

